



# California Regional Water Quality Control Board

## Santa Ana Region



Alan C. Lloyd, Ph.D.  
Agency Secretary

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Arnold Schwarzenegger  
Governor

March 16, 2006

Base Realignment and Closure  
Attn: Mr. Darren Newton  
BRAC Environmental Coordinator  
7040 Trabuco Road  
Irvine, CA 92618

### COMMENTS ON DRAFT FINAL REMEDIAL ACTION REPORT, IRP SITE 11, FORMER MARINE CORPS AIR STATION, EL TORO, SWRCB GEOTRACKER ID: DOD100136200


Dear Mr. Newton:

We have reviewed the above referenced document, dated January 11, 2006, which we received on January 23, 2006. We have the following comments:

- **2.6.3 Backfill Material Evaluation Results**, bullets, page 2-6: The concentrations of copper, selenium, and iron are above the established background concentrations. The concentrations are identified as below their respective preliminary remedial goals (PRGs). Portions of Site 11 include areas that are storm water source and conveyance areas. Selenium and copper are metals of concern to downstream freshwater and marine biota. Additionally, the Newport Bay watershed has a TMDL (total maximum daily load) for selenium. Please provide us with an assessment of the potential impacts to downstream surface water quality from the metals-contaminated soil that was placed at Site 11. We suspect that the selenium and copper concentrations in the Site 2 soil may result in surface water concentrations that exceed the applicable water quality standards.
- **2.8 TRANSPORTATION OF EXCAVATED SOIL TO AN OFF-STATION DISPOSAL FACILITY**, first paragraph, Page 2-6: Approximately 560 tons of contaminated soil were removed and disposed of off-site. Please provide us with a figure for the total quantity (pounds) of PCBs (polychlorinated biphenyls) and pesticides that were removed from the watershed.

For any questions, please call me at (951) 782-4494, or send email to [jbroderick@waterboards.ca.gov](mailto:jbroderick@waterboards.ca.gov).

Sincerely,

  
John Broderick  
SLIC/DoD Section

cc via email: Mr. Richard Muza, US EPA, Region 9  
Mr. Frank Cheng, DTSC, Office of Military Facilities  
Ms. Content Arnold, NAVFACENGCOM, Southwest Division

**California Environmental Protection Agency**



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